

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

UNITED STATES OF AMERICA,

Plaintiff,

v.

COMMONWEALTH OF VIRGINIA,

Defendant.

and

PEGGY WOOD, et al.,

Intervenor-Defendants.

CIVIL ACTION NO. 3:12CV59-JAG

**REVISED JOINT MOTION FOR TERMINATION OF
CONSENT DECREE AND ENTRY OF PERMANENT INJUNCTION**

Pursuant to the Court’s Order of November 7, 2024, ECF No. 542, the United States and the Commonwealth of Virginia, by counsel, hereby jointly submit an updated proposed Permanent Injunction, superseding the parties’ revised joint proposal of September 26, 2024, ECF No. 538, and a redline document reflecting changes between the September 26 and presently filed versions. The parties believe that the updated proposed Permanent Injunction—which reflects additional discussions and negotiations in light of the Independent Reviewer’s concerns—meets the aims of the Consent Decree while minimizing the need for ongoing Court oversight.

WHEREFORE, for the reasons stated above, the United States and the Commonwealth respectfully request that this Court terminate the Consent Decree entered on August 23, 2012, ECF No. 112, and enter the further revised Proposed Order Granting the Parties’ Revised Joint Motion for Termination of Consent Decree and Entry of Permanent Injunction.

Dated: November 21, 2024

Respectfully submitted,

FOR THE UNITED STATES

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CERTIFICATE OF SERVICE

I hereby certify that on November 21, 2024, I electronically filed the foregoing Joint Motion for Termination of Consent Decree and Entry of Permanent Injunction with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record.

/s/ Whitney D. Russell

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